

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

IN RE:) BANKRUPTCY CASE
MALGORZATA WALCZAK,)
Debtor,) NO.: 22-00533
) CHAPTER 13
)
) JUDGE: DEBORAH L. THORNE
)

OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN

Now comes Citibank, N.A., not in its individual capacity but solely as Owner Trustee of New Residential Mortgage Loan Trust 2019-RPL3, by and through its attorneys, McCalla Raymer Leibert Pierce, LLC, and requests that Confirmation be denied, stating as follows:

1. On January 17, 2022, the Debtor filed the instant bankruptcy petition under Chapter 13 of the Bankruptcy Code (11 U.S.C. Sec. 1301 et seq.)
2. Citibank, N.A., not in its individual capacity but solely as Owner Trustee of New Residential Mortgage Loan Trust 2019-RPL3 services the mortgage lien on the real property commonly known as 5052 W Ainslie St, Chicago, IL 60630.
3. Citibank, N.A., not in its individual capacity but solely as Owner Trustee of New Residential Mortgage Loan Trust 2019-RPL3 is preparing to file a claim secured by an interest in the real property located at 5052 W Ainslie St, Chicago, IL 60630.
4. Debtor provides to cure the mortgage arrears due to this Creditor in part 3.1 of the Chapter 13 plan.
5. However, Part 3.1 does not specify who is to make the ongoing post-petition mortgage payments as the “distributed by” box is blank.

6. Therefore, sufficient grounds exist for the denial of confirmation as the Debtor's plan fails to accurately provide for the post-petition mortgage payments.

WHEREFORE, Citibank, N.A., not in its individual capacity but solely as Owner Trustee of New Residential Mortgage Loan Trust 2019-RPL3 respectfully prays that Confirmation of the Debtor's Chapter 13 Plan be denied, and for such other and further relief as this Honorable Court deems just.

Respectfully Submitted,

Citibank, N.A., not in its individual
capacity but solely as Owner Trustee of
New Residential Mortgage Loan Trust
2019-RPL3

/s/Kinnera Bhoopal

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